

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

FILED-CLERK
U.S. DISTRICT COURT
2007 FEB 13 PM 12:07
TX EASTERN-MARSHALL

WHITNEY GUILLORY

Plaintiff

V.

**BEAUMONT INDEPENDENT
SCHOOL DISTRICT
and
CARROL THOMAS, Superintendent
and
FERGUSON PARKER, JR.,
Former Band Director**

Defendants
































CIVIL NO. 2:07cv027

JURY DEMANDED

JUDGE WARD

BY _____

**DEFENDANT FERGUSON PARKER, JR's
ORIGINAL ANSWER INCLUDING DEFENSES**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Defendant, Ferguson Parker, Jr , pro se, and files this his Original Answer Including Defenses and in support thereof would show the following:

I.
Answer

1 For purposes of this Answer, Defendant Parker denies the allegations set forth in Plaintiff's Complaint ¶ I, Sec. 1

2. For purposes of this Answer, Defendant Parker denies jurisdiction alleged in Plaintiff's Complaint ¶ II., Sec. 4.

3 For purposes of this Answer, Defendant Parker denies jurisdiction alleged in Plaintiff's Complaint ¶ II., Sec. 5.

4. For purposes of this Answer, Defendant Parker denies the allegation he has a

propensity for sexually abusing children as set forth in Plaintiff's Complaint ¶ III., Sec. 7.

5. For purposes of this Answer, Defendant Parker denies the allegation he has a propensity for sexually abusing children as set forth in Plaintiff's Complaint ¶ III., Sec. 8.

6. For purposes of this Answer, Defendant Parker denies he is represented by an attorney in this matter as set forth in Plaintiff's Complaint ¶ III., Sec. 9.

7. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 10.

8. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 11.

9. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 13.

10. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 14.

11. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 15.

12. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 16.

13. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 17.

14. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 18.

15. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 19.

16. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 21.

17. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 22.

18. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 24.

19. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 25.

20. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 26.

21. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 27.

22. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 28.

23. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 29.

24. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 30.

25. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 31.

26. For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 32.

27. For purposes of this Answer, Defendant Parker denies the allegations as set forth

in Plaintiff's Complaint ¶ IV., Sec. 33.

28 For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 35.

29 For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 36.

30 For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 37.

31 For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 38.

32 For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ IV., Sec. 39.

33 For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ V., Sec. 40.

34 For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ V., Sec. 41.

35 For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ V., Sec. 42.

36 For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ V., Sec. 43.

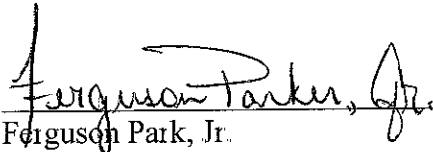
37 For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ V., Sec. 45.

38 For purposes of this Answer, Defendant Parker denies the allegations as set forth in Plaintiff's Complaint ¶ V., Sec. 46.

Defenses

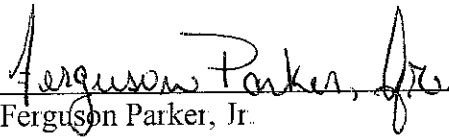
34. Plaintiff's Complaint, in whole or part, fails to state a cause of action.

Respectfully submitted,


Ferguson Park, Jr.
5750 Sunbird
Beaumont, Texas 77708

Certificate of Service

This is to certify that on February 12th, 2007, a true and correct copy of the above and foregoing document was served on Timothy B. Garrigan, P.O. Box 631902, Nacogdoches, Texas 75963-1902, via CM/RRR


Ferguson Parker, Jr.